

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLAN CHIOCCA,

Plaintiff,

v.

THE TOWN OF ROCKLAND, DEIRDRE

HALL,

EDWARD KIMBALL, LARRY RYAN,

MICHAEL MULLEN JR., MICHAEL

O'LOUGHLIN,

RICHARD PENNEY, AND KARA

NYMAN,

Defendant.

CIVIL ACTION NO.

1:19-CV-10482-WGY

DEFENDANT DEIRDRE HALL'S ASSENTED-TO MOTION TO SEAL

Pursuant to Fed. R. Civ. P. 5.2 and D. Mass. Local Rule 83.6.11(b)(4), Defendant Deirdre Hall, hereby moves to seal her assented-to Motion to Stay and the Exhibits attached thereto.

Good cause exists to grant this motion. Defendant Hall's Motion to Stay and its Exhibits include Defendant Hall's medical information. The parties have entered into a Stipulation and Protective Order agreeing that "all documents relating to counseling, psychiatric treatment or other medical treatment sought by any of the parties and all data obtained from said documents be confidential." (Doc. 93). Additionally, D. Mass. Local Rule 83.6.11(b)(4) provides that the Court may protect and file under seal "[a]ny matters of a highly personal or private nature."

The motion to stay is premised upon Defendant Hall's medical information. As such, Defendant Hall seeks to seal her Motion for Stay and its Exhibits to protect her privacy.

WHEREFORE, Defendant Hall, with the Parties' assent, respectfully requests that the Court grant her Motion to Seal.

Dated: February 26, 2020

DEIRDRE HALL,
By Her Attorneys

By /s/ Cindy M. Cieslak
Cindy M. Cieslak (BBO # 685498)
Michael J. Rose (admitted *pro hac vice*)
Robin B. Kallor (admitted *pro hac vice*)
Rose Kallor, LLP
750 Main Street, Suite 1108-3
Hartford, CT 06103
(860) 361-7999
(860) 270-0710 (fax)
ccieslak@rosekallor.com
mrose@rosekallor.com
rkallor@rosekallor.com

CERTIFICATION

I hereby certify that a copy of the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants and that a paper copy shall be served upon those indicated as non-registered participants on February 26, 2020.

Adam J. Shafran, Esq.
Jonathon D. Friedmann, Esq.
Rudolph Friedmann LLP
92 State Street
Boston, MA 02109

Samantha C. Halem, Esq.
Marshall Halem
27 Mica Lane, Suite 102
Wellesley, MA 02481

John J. Davis, Esq.
Jason W. Crotty, Esq.
Samuel R. Gates, Esq.
Pierce, Davis & Perritano, LLP
10 Post Office Square
Suite 1100N
Boston, MA 02109

Ellen J. Zucker., Esq.
Neerja Sharma, Esq.
Burns & Levinson LLP
125 High Street
Boston, MA 02110

Howard Cooper, Esq.
Suzanne Elovecky, Esq.
Todd & Weld LLP
One Federal Street
Boston, MA 02110

/s/ Cindy M. Cieslak
Cindy M. Cieslak